

**FILED**JUL 14 2008 *new*  
Jul 14. 2008  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

James G. Turner-*et*,  
Plaintiff,  
-v-

Case No. 08C 3664

Jodi Harman, *et al.*,  
Defendants.

Hon. James B. Moran,  
U.S. Judge presiding.

James G. Turner-*et*,  
Plaintiff,  
-v-

Case No. 08C 3846

Donald A. Hulick, *et al.*,  
Defendants.

Hon. James B. Moran,  
U.S. Judge presiding.

## EMERGENCY

MOTION TO CONSOLIDATE FOR PURPOSE OF  
PROTECTIVE ORDERS, OR VIDEO CONFERENCE  
CALL *et*

Come now, the plaintiff James G. Turner-*et*,  
Pro Se, in Emergency and respectfully move this  
Court allow consolidation as to this Emergency  
and enter protective orders, or alternatively, order  
a Video Court Conference Call, and in support he  
states:

1. Plaintiff is a prisoner confined to the  
(1) *new*

*et* And Motion For Court Clerk to supply copies

Illinois Dept. Of Corrections (IDOC) at Menard prison confined to segregation unit in a life-threatening imminent danger situation, requiring this Court's immediate attention, in that:

2. Plaintiff a 58 year old bi-sexual (gay) male with High Blood Pressure, Anemia, Hepatitis-C Heart problems, pain in lower right abdomen, lower back and both arms and hands, who weighs 125 lbs. is being deprived medical attention since he had Complaint Case No. OS C 3664 copied. Defendants refuse to afford him any medication for pain, or to put him on call-line to be seen by medical staff for any reason.

3. Defendants haven't taken him off Heart and High Blood Pressure medications, but same is due to run out September 1, 2008, and since the defendants are refusing to see him, he doesn't see how his medications can be reordered.

4. Next, defendants in Case No. OS C 3846 have continually confined plaintiff to a Steel Front Control Hot Box Torture Chamber Cell, subjecting him to High Blood Pressure and breathing attacks due to extreme heat in closed Hot Box cell, and he's afforded no medical treatment. Defendants have no legitimate interest in keeping plaintiff an old sickly, harmless prisoner confined to said cell.

5. But, in violation of prison rules not only have they confined plaintiff to Hot Box Cell but, have assigned several stronger, younger bigger gang members who hate gays to cell with him, who have assaulted him, took his Food and other property, etc, from him and subjected him to imminent danger 24 hours a day. (See Affidavit). Even though according to their rules gay-men are not suppose to be celled with any other inmates while in segregation, but, they've made plaintiff an exception to the rule, and because, medical staff won't provide treatment plaintiff have been forced to treat his own injuries following assaults.

6. In retaliation defendants have went one step further, in that, following plaintiff's last gang member cellmate being released from segregation June 23, 2008 on June 24, 2008, defendants assigned one of plaintiff's long-time documented enemies Ellis Parter \*A-15421 to cell with him in an attempt to get plaintiff killed or seriously injured.

7. Though both Parter and plaintiff have filed grievances and wrote Supervisory Staff nothing has been done to separate us,

③ Over

and we've already had several physical confrontations and altercations, as such, plaintiff cannot sleep, rest, or even think, he must be ever alert to surprise attack, as such, he is subject to imminent danger, reign of terror and a life-threatening dilemma 24 hrs a per day. and he needs Emergency Protective Orders to save him from further injury, and request this Court:

A) Order plaintiff be moved to single-man-open-barred-cell;

B) Order plaintiff be protected by keeping him away from his enemies;

C) Removed from Hot Box cell to regular cell; or,

D) Order, Video, or Conference Call and E) Any additional orders this Court deems equitable, proper and just.

WHEREFORE, DO HE PRAY.

Respectfully submitted,  
James G. Turner Esq.  
James G. Turner-Esq.  
\*N-01161

P.O. Box 711

Menard, IL 62259

STATE OF ILLINOIS

)

) SS

COUNTY OF RANDOLPH

)

## AFFIDAVIT

I, James G. Turner - 44 being first duly sworn upon my oath depose and state that the following matters are both true and correct made upon personal knowledge and belief, and if called as a witness, I am competent to testify thereto: 1) That I am a prisoner in the custody of IDOC at Menard prison confined to a Hot Box Torture Chamber cell in segregation with one of my long documented enemies in retaliation by defendants to get me killed or seriously injured. 2) That following my bringing complaint No. 08 C 3664 defendant Medical personnel began denying me of any medical treatment, other than to issue me my Heart/ High Blood Pressure medications daily, but, same is due to expire 9/1/08, and without being seen by medical staff meds can't be renewed. 3) That on 2/25/08 I was assaulted by enemies and on 2/27/08, was given a (7) day lay-in because I couldn't walk, at that time I was in North 1 on the lowest gallery in the unit. 4) On 2/28/08 I was ordered to pack-up to move to one of the highest galleries in the unit, in the cell with one of my enemies, due to my indefinite low-gallery-permit, (7) day lay-in because I was unable to walk, I couldn't move and was confined to segregation to Hot Box cell. 5) That I was celled with a young crowd gang member who assaulted me 3/29/08 and continued to do so, he took property, food trays and subjected me to reign of terror 24 hrs per day, but defendants would not move me 6) That once young crowd member was released to the general populace 6-11-08, defendants confined another young gang member to cell with me, who also assaulted

## Affidavit (continued) Page 2 of 2

me took my property and food trays and defendants would not move me, and I had to attend to my own wounds as defendant medical staff would afford no medical treatment.

7) However, when gang member was released from segregation 6/23/08, in violation to prison/IDOC Rules defendants assigned inmate Ellis Partee\* A-15421 a longtime documented enemy of mine to cell with me. This assignment was done in retaliation to this complaint Case No. 08C3846 to try and get me killed or seriously injured. Partee and I have had several altercations now I can't sleep, rest, think etc, without being alert to possible assault, I'm in imminent danger of serious physical injury 24 hours a day and need Emergency Protection, before I go mad, or I'm assaulted or worst.

8) I couldn't get copies due to fact prison is on a lockdown status and librarian will only copy documents per Court Orders, as such, I had to submit this single original copy, in hopes this Court Orders the Court Clerk to make him a copy and serve him.

9) He further trust consolidation will be granted due to lack of legal writing material.

10) That further I pray for protective orders, beyond that I sayeth not.

Pursuant to 28 USC 1746, 18 USC 1621 or 735 ILCS 5/1-109, I declare, under penalty of perjury, that everything contained herein is true and accurate to the best of my knowledge and belief. I do declare and affirm that the matter at hand is not taken either frivolously or maliciously and that I believe the foregoing matter is taken in good faith.

Signed on this 9th day of July, 2008.

James B. J EP  
Affiant